

24th August 2011

DIABETES AUSTRALIA
SUBMISSION TO THE AUSTRALIAN GOVERNMENT'S ISSUES PAPER TO INFORM THE
DEVELOPMENT OF A NATIONAL FOOD PLAN

Diabetes Australia is the national peak body for diabetes, comprised of state consumer organisations, and health professionals and research bodies dedicated to diabetes.

Diabetes Australia supports a national food plan that will direct food-related policy and regulation to reduce overweight, obesity and diet related non-communicable disease in Australia as part of a multi-strategy approach to these problems.

Diabetes Australia welcomes the opportunity to respond to the Australian Government's 'Issues Paper to inform the development of a national food plan' ('Issues Paper'). Please note that we are familiar with the submission from the Obesity Policy Coalition and we support that detailed submission, and elements of this response are consistent with that submission.

Good nutritional outcomes are the starting point and provide the basic value proposition for all food – there is little or nothing to be gained from manufacturing, packaging, transporting, marketing and selling unhealthy food. It is a false economy to suggest that this sort of activity will contribute to job creation or growth in GDP as it will also result in increased levels of obesity and preventable chronic diseases, such as diabetes, with concomitant and massive costs to individuals, society and governments.

We support the development of a national food plan that prioritises public health and in particular, the reduction of overweight, obesity and diet-related non-communicable disease in Australia. Food policy, and regulation where necessary, has the capacity, as part of a multi-strategy approach, to address the complex drivers of food supply and demand and enable consumers to make healthier food choices. Food regulation, particularly when combined with consumer education, has the capacity to contribute to improvements in access to healthy food while discouraging the consumption of unhealthy foods.

To ensure that the complex relationships between food policy and public health outcomes are recognised and managed, the plan should be developed in close collaboration with the Australian National Preventive Health Agency and public health groups. Public health groups should also be involved in the evaluation of the plan to measure its effectiveness.

The plan also needs to be “owned” by non-traditional stakeholders such as the Treasury, Education Departments and a variety of civil society organisations, as well as the commercial sector.

To effectively address the drivers of overweight and obesity, the national food plan should develop and lead policy and regulatory measures that have the capacity to improve food labelling, increase access to healthy foods, and protect children from the harmful effects of unhealthy food advertising.

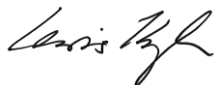
The national food plan needs to be able to articulate to food producers, processors, packagers and marketers the commercial as well as the health benefits of a healthy approach to food, and to better nutritional outcomes.

Diabetes Australia makes the following recommendations:

1. A key objective of the national food plan should be to drive food policy and regulation that, as part of a multi-strategy approach, has the goal of reducing overweight, obesity and the prevalence of diet-related non-communicable diseases in Australia.
2. Public health objectives should be prioritised when considering how efficiency, innovation and competition may be promoted, and how regulatory burdens may be minimised.
3. The comprehensive nutrition policy proposed in the Labelling Logic Report should be developed in collaboration with, or as part of, the national food plan.
4. Food advertising should be recognised as a key driver of food behaviours and consumption, particularly among children, and policies should be developed to restrict unhealthy food advertising to children.
5. The national food plan should be developed and administered by a centralised group capable of working across portfolios, jurisdictions and interest groups. It needs a long term bi-partisan commitment to succeed.
6. Public health professionals should be consulted and/or included on the working groups engaged to develop, implement and evaluate the national food plan.

7. The Government should adopt the recommendations in the Labelling Logic Report, particularly the recommendations for a multiple traffic light labelling scheme and the regulation of nutrition claims. Industry self-regulation has not been effective.
8. The Government should request the Department of Treasury and Finance to investigate the opportunity costs of unhealthy food consumption in Australia. Mechanisms to increase the price of unhealthy foods should also be explored with the use of a portion of the revenue to subsidise healthy foods, such as fruit and vegetables.
9. The Government should request the Department of Treasury and Finance to investigate the opportunity cost of incentivising the production, manufacturing, marketing and sale of healthy food options.
10. The Government should introduce targets for maximum levels of fat, sugar and salt across prepared and processed food categories, together with targets for reduced population intake of fat, sugar and salt.
11. The Government should introduce comprehensive restrictions on unhealthy food advertising, promotion and marketing to children.

Yours sincerely



Lewis Kaplan
Chief Executive Officer